

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	Case No. 15-20855 GLT
)	
LISA R. BALDWIN)	Chapter 13
MARLON E. YOUNGLBLOOD)	
Debtors,)	Docket No.
)	
LISA R. BALDWIN)	
MARLON E. YOUNGBLOOD)	
Movants,)	
)	
v.)	
)	
)	
MIDFIRST BANK AND)	
RONDA J. WINNECOUR, CHAPTER 13)	
TRUSTEE)	
)	
Respondents.)	

DEBTORS' RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY

AND NOW come the Debtors, Lisa Baldwin and Marlon Youngblood, by and through their Attorney, Albert G. Reese, Jr., and files the following Response to Motion for Relief from Automatic Stay:

1. The averments contained in paragraph one are admitted.
2. The averments contained in paragraph two are admitted.
3. The averments contained in paragraph three are admitted.
4. The averments contained in paragraph four are denied. By way of further answer, Creditor Midfirst Bank filed a Response to Notice of Final Cure Payment on August 19, 2020 and confirmed Debtors are current with all post-petition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs. See Exhibit A.
5. The averments contained in paragraph five are denied. By way of further answer, the Debtors' Amended Chapter 13 plan dated June 3, 2016 and confirmed on August 2, 2016, provided for \$14,441.83 to be paid for arrears. See Exhibit B.

6. The averments contained in paragraph six are denied. By way of further answer, the Debtors' Amended Chapter 13 plan dated June 3, 2016 and confirmed on August 2, 2016, provided for \$14,441.83 to be paid for arrears. See Exhibit B.
7. The averments contained in paragraph seven are denied. By way of further answer, the Debtors' Amended Chapter 13 plan dated June 3, 2016 and confirmed on August 2, 2016, provided for \$14,441.83 to be paid for arrears. See Exhibit B.
8. The averments contained in paragraph eight are denied.
9. The averments contained in paragraph nine are admitted.
10. The averments contained in paragraph ten are admitted.
11. The averments contained in paragraph eleven are admitted.
12. The averments contained in paragraph twelve are admitted.
13. The averments contained in paragraph thirteen are admitted.
14. The averments contained in paragraph fourteen are denied.
15. The averments contained in paragraph fifteen are denied.

WHEREFORE, the Debtors pray that this Honorable Court deny the Motion for Relief from Automatic Stay.

Dated: **October 20, 2020**

Respectfully submitted by:
/s/ Albert G. Reese, Jr., Esq.
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